

August 5, 2019

The Honorable Arlene R. Lindsay  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Triplenet Pricing, Inc. v. Ingersoll-Rand Public Limited Company*, 2:19-cv-03861-SJF-ARL – Stipulated Motion to Extend Time For Defendant to Answer, Move, or Otherwise Respond to Complaint

Dear Magistrate Judge Lindsay:

Defendant Ingersoll-Rand Public Limited Company (“Ingersoll-Rand” or “Defendant”) and Plaintiff Triplenet Pricing, Inc. (“Plaintiff”) respectfully submit this stipulated letter motion requesting that this court extend Ingersoll-Rand’s time to answer, move, or otherwise respond to Plaintiff’s Complaint for a period of 60 days, making the Ingersoll-Rand’s answer, motion, or other response due on October 4, 2019.

Defendant’s counsel, Vorys, Sater, Seymour and Pease LLP, was retained in this matter on Friday, August 2, 2019, and local counsel Clarick Gueron Reisbaum LLP was retained this morning, Monday, August 5, 2019. The Defendant requested time to evaluate the allegations contained in the Complaint and to prepare a response thereto, and Plaintiff’s counsel agreed to provide Defendant 60 days for Defendant to do so. The parties have attached a proposed order to this stipulated letter motion.

**CLARICK  
GUERON  
REISBAUM**

**Nicole Gueron**  
[ngueron@cgr-law.com](mailto:ngueron@cgr-law.com)  
Direct: 212.633.4312

Respectfully submitted,



Nicole Gueron  
220 Fifth Avenue  
14<sup>th</sup> Floor  
New York, NY 10001  
Telephone: (212) 633-4310  
[ngueron@cgr-law.com](mailto:ngueron@cgr-law.com)

/s/ *Solomon E. Antar*

Solomon E. Antar  
26 Court Street  
Ste. 1200  
Brooklyn, NY 11242  
Telephone: (718) 769-3200  
[solomon@antarlawfirm.com](mailto:solomon@antarlawfirm.com)

*Attorney for Defendant Ingersoll-Rand Public  
Limited Company*

*Attorney for Plaintiff Triplenet Pricing, Inc*

cc: Judge Sandra J. Feuerstein (via mail and ECF)

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

TRIPLENET PRICING, INC.

*Plaintiff*

v.

Civil Action No.: 1:19-cv-3861-SJF-  
ARL

INGERSOLL-RAND PUBLIC LIMITED  
COMPANY.

*Defendant*

---

**[PROPOSED] ORDER ON STIPULATED MOTION TO EXTEND TIME FOR  
DEFENDANT TO ANSWER, MOVE, OR OTHERWISE RESPOND TO COMPLAINT**

---

Based upon the stipulation of the parties (Doc. No. 4), IT IS ORDERED that Defendant Ingersoll-Rand Public Limited Company, shall have until Friday, October 4, 2019, to move, plead, or otherwise respond to the Complaint brought by Plaintiff Triplenet Pricing, Inc. in this matter.

**IT IS SO ORDERED.**

**SIGNED** and **ENTERED** this \_\_\_\_\_ day of \_\_\_\_\_ 2019.

---

The Honorable Arlene R. Lindsay  
Magistrate Judge, Eastern District of New York